

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and JOHN )  
MEINERS, individually and on behalf of all )  
others similarly situated, )

Plaintiffs, )

v. )

NATIONAL ASSOCIATION OF )  
REALTORS, COMPASS, INC., EXP )  
WORLD HOLDINGS, INC., REDFIN )  
CORPORATION, WEICHERT RELATORS, )  
UNITED REAL ESTATE, DOUGLAS )  
ELLMAN, INC, and BERKSHIRE )  
HATHAWAY ENERGY COMPANY, )

Defendants. )

Case No: 4:23-cv-00788-SRB

Judge Stephen R. Bough

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO  
DEFENDANT NATIONAL ASSOCIATION OF REALTORS®**

Don Gibson, Lauren Criss, and John Meiners (collectively, “Plaintiffs”), and the National Association of REALTORS® (“NAR”) (together with Plaintiffs, the “Parties”) respectfully write to the Court to provide notice that the Plaintiffs have reached an agreement with NAR to settle all claims asserted against NAR in this action as part of a proposed nationwide class settlement. This agreement was jointly negotiated with the plaintiffs in *Burnett v. The National Association of Realtors*, No. 4:19-cv-00332 (W.D. Mo.), *Moehrl v. The National Association of Realtors*, No. 1:19-cv-01610 (N.D. Ill.), *Gibson v. National Association of Realtors*, No. 4:23-cv-00788 (W.D. Mo.), and *Umpa v. National Association of Realtors*, No. 4:23-cv-00945 (W.D. Mo.). This agreement is subject to the Court’s approval under Rule 23 of the Federal Rules of Civil Procedure. Consistent with the agreement, Plaintiffs will file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, Plaintiffs and NAR hereby jointly stipulate and request that the Court stay all deadlines and procedures solely as to NAR to preserve the resources of Plaintiffs, NAR, and the Court and to allow the Parties to formalize the agreement and to seek preliminary and final approval of the settlement.

Dated: March 22, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Ethan Glass

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